

FELONY

AO 91 (Rev. 11/11) Criminal Complaint

United States Courts

Southern District of Texas

FILED

October 15, 2021

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America v.

Juan Sanchez Jr.

Case No. B-21-MJ-975

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Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 14, 2021 in the county of Cameron in the
Southern District of Texas, the defendant(s) violated:*Code Section*

31 U.S. Code § 5332

Offense Description

knowingly conceals more than \$10,000 in currency or other monetary instruments on the person of such individual or in any conveyance, article of luggage, merchandise, or other container, and transports or transfers or attempts to transport or transfer such currency or monetary instruments from a place within the United States to a place outside of the United States, or from a place outside the United States to a place within the United States.

This criminal complaint is based on these facts:

See attachment.

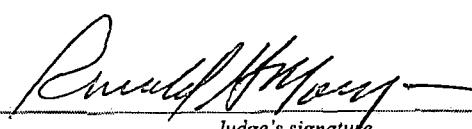
 Continued on the attached sheet.


Complainant's signature

Fidel Saenz, HSI Special Agent

Printed name and title

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed. R. Crim.P. 4.1, on this 15th day of October, 2021.

Date: 10/15/2021


Judge's signature

Ronald G. Morgan United States Magistrate Judge

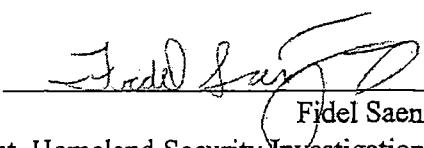
Printed name and title

City and state: Brownsville, Texas

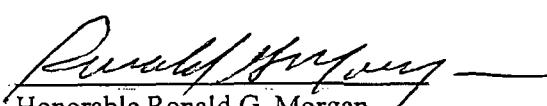
B-21-MJ-975

I, Fidel Saenz, a Special Agents of the U.S. Immigration and Customs Enforcement, Homeland Security Investigations, being duly sworn, hereby depose:

1. I make this affidavit in support of a criminal complaint charging Juan SANCHEZ Jr. with knowingly concealing more than \$10,000 in currency or other monetary instruments on a person of such individual or in any conveyance, article of luggage, merchandise, or other container, and transports or transfers or attempts to transfer or transfer such currency or monetary instruments from a place within the United States (U.S.) to a place outside of the United States, or from a place outside the United States to a place within the United States.
2. On October 14, 2021, Juan SANCHEZ Jr. was stopped and inspected by United States Customs and Border Protection (CBP) Officers (CBPOs) at the Gateway Port of Entry as SANCHEZ Jr. attempted entry into Mexico in a 2020 black Chevrolet Silverado, with Texas registration [REDACTED]. SANCHEZ Jr. gave a negative declaration to CBPOs in the outbound inspection lane. CBPOs asked an additional time if SANCHEZ Jr. had currency over \$10,000 U.S. dollars to declare. SANCHEZ Jr. repeated his negative declaration. In secondary inspection, CBPOs discovered approximately \$123,246.00 in undeclared currency concealed within SANCHEZ Jr.'s 2020 black Chevrolet Silverado.
3. During the interview SANCHEZ Jr. was advised of his Miranda Rights, to which SANCHEZ Jr. waived. SANCHEZ Jr. admitted to knowing the bulk currency was concealed within his vehicle and admitted to agents that he knew it was illegal to transport bulk currency, in excess of \$10,000 U.S.D., into Mexico from the United States without declaring it to CBP. SANCHEZ Jr. stated he was to be paid to transport the bulk currency, but the amount was unknown.


Fidel Saenz
Special Agent, Homeland Security Investigations

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed. R. Crim.P. 4.1, on this 15th day of October 2021.


Honorable Ronald G. Morgan
United States Magistrate Judge
Southern District of Texas